## Exhibit 42

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Page 42
                                                                                                              Page 44
                       - STUART BRESLOW -
 1
                                                             1
                                                                                    - STUART BRESLOW -
2
       managing programmers or engineers in your role as
                                                             2
                                                                    Morgan Stanley.
 3
       chief compliance officer?
                                                             3
                                                                                In the last year you were there?
                   The team of 250 people who worked in
 4
                                                             4
                                                                                Not the last -- the last year I was
5
       the group who were subject to my strategic
                                                             5
                                                                    doing more advisory work for the general counsel,
 6
       direction were a mix of programmers, engineers,
                                                                    so probably the last -- the two years before that.
 7
       solutions architects, product managers. So my own
                                                             7
                                                                                Well, I think you said you were
8
       sense is that I was more of the manager of that
                                                             8
                                                                    exploring it. If you used a different word, I
 9
       program -- I was strategic manager of that
                                                             9
                                                                    apologize. Had Morgan Stanley actually adopted
10
       program at least from 2005 to 2016 because that
                                                                    machine learning at that point in time?
                                                            10
11
       was -- that was probably the major initiative in
                                                                                I don't recall.
                                                            11
12
       the compliance group.
                                                            12
                                                                                Do you have a Ph.D. or Masters of
                   Were those -- that group of 250, were
13
                                                                    Science in computer science?
                                                            13
14
       they considered to be part of the compliance
                                                            14
                                                                        Α.
15
       department or part of the IT group?
                                                            15
                                                                                Do you have a Ph.D. or Master of
16
                   They were part of the IT department
                                                            16
                                                                    Science in a related technical field --
17
       and they reported to the IT department, but they
                                                                                MR. GAGE: Objection.
                                                            17
18
       were responsive to our strategic decision-making.
                                                            18
                                                                        Ο.
                                                                                -- of computer science?
19
                   So by way of contrast, before I went
                                                            19
                                                                                MR. GAGE: Objection.
20
       back to Morgan Stanley the -- the IT department
                                                            20
                                                                                We went through my background before.
21
       basically told the compliance department what they
                                                            21
                                                                   You know that I have a JD from Columbia University
22
       were working on. When I returned to Morgan
                                                            22
                                                                    School of Law. That's my -- my -- my final
23
       Stanley, I -- I made the decision, and the IT
                                                            23
                                                                    educational experience.
24
                                                                                And so is the answer no, you do not
       department agreed, that the strategic direction
                                                            24
25
       would be set by me; and so I was the one who set
                                                            25
                                                                   have a Ph.D. or MS in the technical field related
                                                  Page 43
                                                                                                              Page 45
1
                       - STUART BRESLOW -
                                                             1
                                                                                    - STUART BRESLOW -
2
       the strategic direction and the tactical projects
                                                                    to computer science.
 3
       they were working on as opposed to the other way
                                                             3
                                                                                MR. GAGE: Objection.
 4
       around. This is what it had been when I wasn't
                                                             4
                                                                        Α.
                                                                                That's a different question than the
 5
       there.
                                                                    one you just asked, so the answer is no.
                                                             5
 6
                   So is it fair to say that compliance
                                                             6
                                                                        Q.
                                                                                Have you ever built an engineering
 7
       was the business partner that that IT group was
                                                             7
                                                                    team?
8
       supporting?
                                                             8
                                                                                MR. GAGE: Objection.
                                                                                Well, at Google Cloud yeah, we
9
                                                             9
            Α.
                                                                    created an engineering team to support the
10
            0.
                   In any of the roles that we've
                                                            10
       discussed thus far, did you work with cloud
                                                                    financial services vertical.
11
                                                            11
       technology?
                                                                                Okay. In the roles that we've
12
                                                            12
13
            Α.
                   No.
                                                            13
                                                                    discussed thus far ending with your time as an
14
                   In any of the roles that we've
                                                            14
                                                                    advisor -- as partner at McKinsey in 2017 or 2018,
15
       discussed thus far, did you work with machine
                                                            15
                                                                    up until that point in time had you ever built an
16
       learning?
                                                                    engineering team?
                                                            16
17
            A.
                                                            17
                                                                        A.
18
            Ο.
                   In what capacity?
                                                            18
                                                                                MR. GAGE: Objection.
19
            Α.
                   Machine learning was -- machine
                                                            19
                                                                                Up through the end of your time at
20
       learning became foundational to compliance systems
                                                            20
                                                                   McKinsey in 2018, had you ever managed an
                                                                    engineering team?
21
       and we were exploring ways to use machine learning
                                                            21
22
                                                            22
                                                                                MR. GAGE: Objection.
       in what we were doing.
23
                   During what period of time?
                                                            23
            Q.
                                                                                Again, you know, just to be
                                                                        Α.
24
           A.
                   Later, later in time. I don't know
                                                            24
                                                                    con -- it's question of what you mean by
25
       precisely when, but towards the end of my time at
                                                                    "managed," but again I make reference to the team
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		D 46		P 40
1		Page 46 - STUART BRESLOW -	1	Page 48   - STUART BRESLOW -
2	that suppo	orted my group for which I provided	2	Q. Okay.
3		direction and tactical direction at	3	MS. GREENE: We have been going about
4	Morgan Sta		4	an hour. I don't know if anyone is in need
5	0.	And apart from that you never	5	of a break. If so, this would be a good time
6	~	nanaged an engineering team, correct?	6	for a five-minute break or I'm happy to
7	Α.	No.	7	continue pushing on.
8	0.	Do you have any technical	8	MR. GAGE: You can keep going.
9	Α.	I'm sorry, I quess the answer to that	9	THE VIDEOGRAPHER: Okay standby. The
10		rould be yes because you said "never," so	10	time is 10:29 a.m. and we're going off the
11	-	ou want me to say yes and not no. I	11	record.
12	_	for speaking over you.	12	(Whereupon, there was a brief recess
13	0.	So the answer is you never managed an	13	in the proceedings.)
14	~	q team directly, correct?	14	THE VIDEOGRAPHER: The time is 10:36
15	engineerin	MR. GAGE: Objection.	15	a.m. and we're back the record.
	Α.	, and the second	16	
16 17	A. 0.	Yes.  Have you had any technical training	17	Q. Mr. Breslow, when did you join
	~	ect to computer science?	18	Google?
18	-	•		A. July, 2018.
19	Α.	No.	19	Q. And how did you come to join Google?  A. I was recruited.
20	Q.	Have you had any technical training	20	
21	_	ect to computer engineering?	21	Q. By whom?
22	Α.	No.	22	A. Tariq Shaukat, T-A-R-I-Q
23	Q.	Have you had any technical training	23	S-H-A-U-K-A-T.
24	_	ect to coding?	24	Q. Did you know Mr. Shaukat prior to
25	A.	No.	25	being recruited by him?
		Page 47		Page 49
1		Page 47 - STUART BRESLOW -	1	Page 49 - STUART BRESLOW -
1 2	Q.	_	1 2	-
	~	- STUART BRESLOW -		- STUART BRESLOW -
2	~	- STUART BRESLOW - Have you had any technical training	2	- STUART BRESLOW - A. I did not. I received a phone call
2 3	with respe	- STUART BRESLOW - Have you had any technical training ect to programming?	2 3	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an
2 3 4	with respe	- STUART BRESLOW - Have you had any technical training ect to programming? No.	2 3 4	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search
2 3 4 5	with respe A. Q.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code?	2 3 4 5	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.
2 3 4 5 6	with respe A. Q. A.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No.	2 3 4 5	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got
2 3 4 5 6 7	with respe A. Q. A. Q.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program?	2 3 4 5 6 7	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?
2 3 4 5 6 7 8	with respe A. Q. A. Q. A.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program?	2 3 4 5 6 7 8	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some
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2 3 4 5 6 7 8 9	with respe A. Q. A. Q. A. question?	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the	2 3 4 5 6 7 8 9	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was
2 3 4 5 6 7 8 9 10	with resperiture A. Q. A. Q. A. question? Q. programmin A.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the Do you know how to do computer	2 3 4 5 6 7 8 9 10	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of
2 3 4 5 6 7 8 9 10 11 12	with resperiture A. Q. A. Q. A. question? Q. programmin A.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the Do you know how to do computer ag? What was the question before that?	2 3 4 5 6 7 8 9 10 11	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously
2 3 4 5 6 7 8 9 10 11 12 13	with resperiture A.  Q. A. Q. A. question? Q. programmin A. Maybe I mi	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the Do you know how to do computer ag? What was the question before that?	2 3 4 5 6 7 8 9 10 11 12 13	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously my as you've seen, my resume is on LinkedIn and
2 3 4 5 6 7 8 9 10 11 12 13 14	with resperation A.  Q. A. Q. A. question? Q. programmin A. Maybe I min question.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the Do you know how to do computer ag? What was the question before that? ssed it. I thought that was the same	2 3 4 5 6 7 8 9 10 11 12 13 14	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously my as you've seen, my resume is on LinkedIn and I have a fairly good reputation, so they thought I
2 3 4 5 6 7 8 9 10 11 12 13 14	with resper A. Q. A. Q. A. question? Q. programmin A. Maybe I mi question. Q.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the Do you know how to do computer ag? What was the question before that? ssed it. I thought that was the same	2 3 4 5 6 7 8 9 10 11 12 13 14	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously my as you've seen, my resume is on LinkedIn and I have a fairly good reputation, so they thought I might fill the bill.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	with resperation A.  Q. A. Q. A. question? Q. programmin A. Maybe I mit question. Q. code. A.	- STUART BRESLOW - Have you had any technical training ect to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the  Do you know how to do computer ag? What was the question before that? Essed it. I thought that was the same	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously my as you've seen, my resume is on LinkedIn and I have a fairly good reputation, so they thought I might fill the bill.  Q. Who is Ruth Porat?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	with resperation A.  Q. A. Q. A. question? Q. programmin A. Maybe I mit question. Q. code. A. program and computer p. Q.	- STUART BRESLOW - Have you had any technical training let to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the  Do you know how to do computer lag? What was the question before that? Lessed it. I thought that was the same  First I asked if you know how to No, then you said do you know how to all then you said do I know how to brogram, is that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously my as you've seen, my resume is on LinkedIn and I have a fairly good reputation, so they thought I might fill the bill.  Q. Who is Ruth Porat?  A. Ruth Porat is the chief financial officer of Alphabet.  Q. And do you know her?  A. I do.  Q. How do you know her?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	with respect A. Q. A. Q. A. question? Q. programmin A. Maybe I mi question. Q. code. A. program an computer p Q. to make su to code?	- STUART BRESLOW - Have you had any technical training set to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the  Do you know how to do computer sig? What was the question before that? seed it. I thought that was the same  First I asked if you know how to  No, then you said do you know how to ad then you said do I know how to  program, is that Let me just ask a few questions just are the record is clear. Do you know how  No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously my as you've seen, my resume is on LinkedIn and I have a fairly good reputation, so they thought I might fill the bill.  Q. Who is Ruth Porat?  A. Ruth Porat is the chief financial officer of Alphabet.  Q. And do you know her?  A. I do.  Q. How do you know her?  A. Probably and I don't remember whether it was 1988 or 1989 she was the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	with respect A. Q. A. Q. A. Q. A. question? Q. programmin A. Maybe I mi question. Q. code. A. program and computer program and code?	- STUART BRESLOW - Have you had any technical training let to programming? No. Do you know how to code? No. Do you know how to program? I'm sorry, what's what's the  Do you know how to do computer lag? What was the question before that? Lessed it. I thought that was the same  First I asked if you know how to No, then you said do you know how to ad then you said do I know how to brogram, is that Let me just ask a few questions just are the record is clear. Do you know how	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	- STUART BRESLOW -  A. I did not. I received a phone call from Spencer Stuart that they were conducting an executive search and I participated in the search and that's how I met Tariq.  Q. Do you know how Spencer Stuart got your name?  A. I I don't. I assume it was some mix of I had spoken to them several times over the years when I was at Morgan Stanley. As I was retiring I talked about opportunities with one of their senior partners, and then obviously my as you've seen, my resume is on LinkedIn and I have a fairly good reputation, so they thought I might fill the bill.  Q. Who is Ruth Porat?  A. Ruth Porat is the chief financial officer of Alphabet.  Q. And do you know her?  A. I do.  Q. How do you know her?  A. Probably and I don't remember

	Page 54		Page 56
1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	A. No, the only one I pointed Stuart	2	A. Didn't I just say that?
3	Vardaman to was was Ruth. Vardaman,	3	Q. If you can, answer the questions that
4	V-A-R-D-A-M-A-N.	4	I've asked you.
5	Q. Did you participate in any job	5	MR. GAGE: Objection.
6	interviews in connection with your hiring by	6	A. Yes.
7	Google?	7	Q. And were you at the time you were
8	A. Yeah, I was interviewed.	8	being recruited, were you told what your job title
9	Q. How many times?	9	would be?
10	A. Three.	10	A. No.
11	Q. Were any of those group interviews?	11	Q. At the time you were being recruited,
12	A. I'm sorry, were any of those what?	12	was the future development of the role discussed
13	Q. Group interviews.	13	in any way?
14	A. No.	14	MR. GAGE: Objection.
15	Q. Do you recall who it was that you	15	A. I don't know what that means.
16	interviewed with?	16	Q. At the time you were being recruited,
17	A. Yes.	17	did you have any discussions about where or how
18	Q. And who was that?	18	the role might develop over time?
19	A. I had a phone interview with Tariq	19	A. The role is a new role. It didn't
20	which then led to an in-person interview a set	20	exist before, so the role as described it was
21	of in-person interviews in Sunnyvale with Diane	21	future looking. I wasn't replacing somebody. The
22	Greene, Tariq Shaukat again, Greg Moore, Fiona	22	role didn't exist.
23	O'Donnell who was on a video con, and that was it.	23	Q. Were there any discussions on what
24	I was supposed to meet with Kevin Piraino, but he	24	the role might look like down the road in two
25	had not completed the Google interview training so	25	years, five years, anything like that?
1	Page 55 - STUART BRESLOW -	1	Page 57 - STUART BRESLOW -
1 2	- STUART BRESLOW -	1 2	- STUART BRESLOW -
	- STUART BRESLOW - we adjourned that one, and then subsequently I met		- STUART BRESLOW - MR. GAGE: Objection.
2	- STUART BRESLOW -	2	- STUART BRESLOW - MR. GAGE: Objection.
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1	Page 62 - STUART BRESLOW -	1	Page 64 - STUART BRESLOW -
2	were being paid at McKinsey?	2	O. And is this the final offer letter
3	A. Probably not.	3	that you received?
4	Q. Do you know whether they were aware	4	A. To my knowledge I I signed it, so
5	of what you were being paid at McKinsey?	5	I'm assuming this is the last one. You know, I'm
6	A. Don't know.	6	sorry, to to your point, no, to my knowledge
7	Q. At the time that you joined Google,	7	there was no subsequent one. This was it.
8	you still had outstanding RSQs from Morgan I'm	8	Q. And did you negotiate any component
9	sorry, outstanding awards, deferred awards from	9	of this offer letter?
10	Morgan Stanley, correct?	10	A. No.
11	A. Correct.	11	Q. If I can direct your attention to the
12	Q. Did you forfeit any of those awards	12	salary.
13	by virtue of joining Google?	13	A. Yes, got it.
14	A. No.	14	Q. The , is that your
15	Q. And so no portion of the initial	15	recollection as to what your salary was at the
16	equity award from Google was replacement equity	16	time you joined?
17	for amounts that you were losing by virtue of	17	A. Yes.
18	joining?	18	Q. Under "Bonus Target" it says, "Your
19	A. Sorry, there's there's just a	19	annual bonus target will be of your
20	negative embedded in there. I want to make sure	20	base salary." Is that the annual cash bonus that
21	I answer the question properly. So no portion	21	you were referring to when we spoke earlier?
22	was yeah yes, no portion no portion was	22	A. Yes.
23	made good.	23	Q. And with respect to equity
24	Q. Okay. If we can go back to Box,	24	compensation does this reflect that you received
25	we're going to look at another document.	25	two awards, one for and one for ?
1	Page 63		Page 65
1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	A. Okay, let me let me minimize. I	2	A. Yeah. So I was basically right when
3	don't need to minimize yeah. Got it, okay.	3	I said it before, yeah.
4	Back in the Box, yes.	4	Q. Okay, and do you recall receiving
5	Q. And if you hit refresh, you should	5	both of those awards?
6	see Tab 13.	6	A. Well, both awards were deposited into
7	A. Hold on, let me refresh. Okay, got	7	a a brokerage account at Morgan Stanley, yeah.
8	Tab 13. Open it?	8	Q. What was your level in Google at the
9	Q. Right.	9	time of your hire?
10	A. Opened, yes, got it.	10	A. I didn't know. I came to learn I was
11	Q. I'm going to mark	11	an L 9.
12	A. So Hold on, it keeps giving me hints	12	Q. When did you come to know that you
13	on how to use Box.	13	were an L 9?
14	Okay, got it.	14	A. At some point. I'm sorry, some point
15	Q. We're going to mark this as Exhibit	15	subsequent to my hiring. I I don't remember
16	13. Exhibit 13, Bates stamped GOO2 I'm sorry,	16	exactly when.
17	GOOG-ROWE-00060576 through 578.	17	Q. Was it while you were still at
18	(Whereupon, Exhibit 13 was marked at	18	Google?
19	this time.)	19	A. Yeah. Sorry, do you want me to
20	Q. Do you recognize this document?	20	continue looking at this or do you want me to come
21	A. Hold on.	21	back to the video, what would you like?
22	Yes.	22	Q. We're done with this document if you
23	Q. And what do you recognize this	23	want to put it aside.
24	document to be?	24	A. Okay, let me come back to you. Hold
25	A. The offer letter from Google to me.	25	on.
1		1	

Thank you.  7 Thank you.  8 C. Is a managing director in Google the age as a director?  8 M. GASS: Objection.  8 A. I always found that somehate titles I didn't understand, so I don't know whether our managing director and a director are just the same or different.  9 Whether our managing director and a director are just the same or different.  10 C. De you know whether Levels 8 and 9  11 A. I don't know that.  12 are considered director levels 2 and 9  13 A. I don't know that.  9 Did you negotiate with Occale your 19  14 A. No. I assume my level was based on 16  15 A. No. I assume my level was based on 16  16 A. No. I assume my level was based on 16  17 my years of experience and my, you know, value to the organization.  18 Q. Did they tell you shot your level was based on 20  19 Level?  10 A. No. Just assumed that's how they 20  21 A. No. Just assumed that's how they 21  22 years of experience in financial services. I had 22  23 worled with, you know, CROS, a close advisor to 20  24 C. COS. In my McKineey time I also worked with 21  25 financial institutions globally and in times of 21  26 core, I net with very senior pedpe at Google. 7  27 me with regulators along this entire propel, so 25  28 that's - I don't know. Didn't seem - didn't 3  29 and Coogle ever communicated to your the basis for your 12  20 level?  21 A. R. Right, other than through my 14 assumptions.  22 C. A. the time you some that is for your 12  23 level is that corner?  24 A. No. D. No. O. The time was power propels at Google. 7  25 A. Right, other than through my 14 assumptions.  26 C. D. A. The time you were hired, did 16 anyone on habalf of Google seglain to you the basis for your level, was 2 my reposited that you were hired to factors that were disclain was?  29 A. Khe time you some that is for your level, was 2 my reposited that you were hired to factors that were disclain what your salary, 16  20 A. The time would be basis for your 19  21 A. No. O. The clear, thought No con 2 monaging the power of the concept of the concept of Tail		Page 66		Dama (0)
Q. Is a managing director in Google the same as a director?  NR. GAGE: Objection.  A. I always found that somewhat confusing, I didn't know - some of the coopeate titles I didn't understand, so I don't know whether our managing director and a director are titles E didn't understand, so I don't know whether our managing director and a director are put the same on different.  O. Do you know whether levels 8 and 9 I are considered director level roles at Google?  A. I don't know that.  O. Did you repotiate with Google your the paragraphy of the compact of experience and my, you know, value to the crymitation.  O. Did they tell you when your level was based on the the regulation.  O. Did they tell you what your level was to the crymitation.  O. Did they tell you what your level was to the crymitation.  O. Did they tell you what your level was to the crymitation.  O. Did whow, I had 50-fplus years of experience in financial services. I had years of experience	1	Page 66 - STUART BRESLOW -	1	Page 68 - STUART BRESLOW -
## Same as a director?    MR. GKSR: Objection.	2	Thank you.	2	industry alliances, something like whatever
Second	3	Q. Is a managing director in Google the	3	Tariq's group. They had some name, but something
at the time.  The confusing of didn't know some of the comporate titles whatever the group was that 'Rariq Shaukat managed' shatter our managing director and a director are to provide the comporate title shadows the composition of	4	same as a director?	4	like that. Some name like vertical platforms
titles I didn't understand, so I don't know shether our managing director and a director are specified director and a director are 10 just the same or different. 11 Q. Do you know whether Levels 8 and 9 11 Google with the concept of ladder? 12 are considered director level roles at Google? 13 A. I don't know that. 14 Q. Did you negotiate with Google your 15 level? 16 A. No. I assume my level was based on 16 D. Did you cave see the ladder? 17 my years of experience and my, you know, value to 18 the organization. 19 Q. Did they tell you what your level was 19 based on? 21 A. No, I just assumed that's how they 22 came to conclude it. You know, I had 30-plus 23 years of experience in financial services. I had 24 worked with, you know, CEGO, a close advisor to 25 GBOs. In my McKinsey time I also worked with 26 crists. So I you know, time I also worked with 27 citate. So I you know, time I also worked with 28 sufficiently senior. 29 Even even my time at Google, you 29 know, I met with very senior people at Google. I net with regulators along with senior people, so 20 that's I don't know. Didn't seem didn't surprise me I was a Level 9. 20 Q. To be clear, though: No one at 21 Google with the concept of ladder? 21 A. No. I we worked with you know what in the sol of songle cloud along with P.H. 22 surprise me I was a Level 9. 33 A. Right, other than through my 34 assumptions. 45 Q. To be clear, though: No one at 46 Google ever comminicated to you the basis for your 47 Level; is that correct? 48 A. No. 49 A. No. 50 Q. At the time you were hired, did 51 Q. Now, at the time you were hired, was 52 A. Yeah. 53 Corporation on behalf of Google explain to you the 54 factors that were dictating what your salary, 55 Dougle with the concept for Google Cloud slockally? 50 Mas tass group or organizational mass of 51 Q. Now, at the time you were hired, did 52 Q. At the time you joined Google, what 53 Group organizations mas? 54 A. No. 55 Q. At the time you joined Google, what 56 Google ever comminicated to you the 57 A.	5	MR. GAGE: Objection.	5	industry alliances I think was probably the name
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10	8	titles I didn't understand, so I don't know	8	whatever the group was that Tariq Shaukat managed?
11 Q. Do you know whether Levels 8 and 9 12 are considered director level roles at Google? 13 A. I don't know that. 14 Q. Did you negotiate with Google your 15 level? 16 A. No. I assume my level was based on 17 my years of experience and my, you know, value to 18 the organization. 19 Q. Did they tell you what your level was 20 based on? 21 A. No, I just assumed that's how they 21 A. No, I just assumed that's how they 22 came to conclude it. You know, I had 30-plus 23 years of experience in financial services. I had 24 worked with, you know, GBDs, a close advisor to 25 CEDs. In my McKinsey time I also worked with 26 financial institutions globally and in times of 27 crisis. So I - you know, they thought I was 28 sufficiently senior. 29 Fren - even my time at Google, you 20 financial institutions allow the senior people, so 21 that's - I don't know. Didn't seem - didn't surprise me I was a Level 9. 22 Come with the concept of ladders? 23 A. No No. 24 A. No No No. 25 CEDs. In my McKinsey Lime I also worked with 26 Row, I as with very senior people at Google, I for surprise me I was a Level 9. 27 A. Nell, he was co he was 28 that's I don't know. Didn't seem didn't surprise me I was a Level 9. 28 A. Right, other than through my 29 assumptions. 20 At the time you were hired, did 20 A. No. 21 A. No. 22 Q. At the time you were hired, did 23 crost that were dictating what your salary, 24 A. No. 25 CD Now, at the time you were hired, was 26 it your understanding that you were hired, was 27 industries? 28 A. No. 29 A. What's it called. Industry 29 Group or organizational unit did you wack in? 20 Q. At the time you goined Google, what 21 Q. A. What's it called. Industry 21 A. No. 22 Q. At the time you gorned Google, what 23 group or organizational unit did you wack in? 24 A. What's it called. Industry 25 A. What's it called. Industry 26 A. What's it called. Industry 27 A. Wou're talking about at the time I	9	whether our managing director and a director are	9	A. Yes.
12	10	just the same or different.	10	Q. Do you know are you familiar at
13 A. I don't know that.  14 Q. Did you negotiate with Google your  15 level?  16 A. No. I assume my level was based on  17 my years of experience and my, you know, value to  18 the organization.  19 Q. Did they tell you what your level was  19 D. Did you reporting line in the  20 based on?  21 A. No, I just assumed that's how they  22 came to conclude it. You know, I had 30-plus  23 years of experience in financial services. I had  24 worked with, you know, CEDs, a close advisor to  25 CEROS. In my McKinsey time I also worked with  26 trisis. So I you know, they thought I was  27 sufficiently senior.  28 sufficiently senior.  29 based on?  20 D. What was your ladder ever shared with you?  20 D. What was your reporting line in the  21 position you held at the time you joined Google?  22 MR. GMGE: I'm sorry, can you say  23 that again. There was some paper shuffling,  24 Cara.  25 CEROS. In my McKinsey time I also worked with  25 A. Yeeh.  26 Financial institutions globally and in times of  27 crisis. So I you know, they thought I was  28 sufficiently senior.  29 Even even my time at Google, you  29 financial institutions globally and in times of  20 crisis. So I you know, but the was  21 at the time?  22 D. What was your reporting line in the  23 position you held at the time you joined Google?  24 A. I reported to Tarig Shaukat.  25 Q. Do you recall what Mr. Shaukat's  26 title was at the time?  27 A. Well, he was co he was  28 co-president of Google Cloud along with P.H.  29 surprise me I was a Level 9.  20 A. Right, other than through my  21 assumptions.  22 Q. Do you know what his level was?  23 A. Only by hypothesis that if if I  24 was 9, he had to be 10.  25 Q. Now, at the time you were hired, did  26 anyone on behalf of Google explain to you the  27 factors that were dictating what your salary,  28 brus, and compensation was?  29 A. No. No.  20 Q. Was it your understanding that you were hired to lead  21 the customer-facing regulatory and compliance  22 engagement for Google Cloud glob	11	Q. Do you know whether Levels 8 and 9	11	Google with the concept of ladders?
14 Q. Did you negotiate with Google your 15 level? A. No. I assume my level was based on 16 A. No. I assume my level was based on 17 my years of experience and my, you know, value to 18 the organization. 19 Q. Did they tell you what your level was 19 based on? 20 Q. What was your reporting line in the 21 position you held at the time you joined Google? 22 came to conclude it. You know, I had 30-plus 23 years of experience in financial services. I had 24 worked with, you know, GROs, a close advisor to 25 CEOS. In my McKinsey time I also worked with 26 crisis. So I you know, they thought I was 27 financial institutions globally and in times of 28 crisis. So I you know, they thought I was 29 sufficiently senior. 20 know, I met with very senior people as Google, you 20 know, I met with very senior people as Google, you 21 level; is that correct? 22 level; is that correct? 23 A. Right, other than through my 24 assumptions. 25 Q. At the time you were hired, did 26 anyone on behalf of Google explain to you the 27 factors that were dictating what your salary, 28 bonus, and compensation was? 29 A. No. No. 20 THE NITHESS: Sorry, Hope. 20 A. What's it called. Industry 21 A. What's it called. Industry 22 A. You're talking about at the time I	12	are considered director level roles at Google?	12	A. Yes.
15 level?  A. No. I assume my level was based on the organization.  9 Q. Did they tell you what your level was based on the organization.  9 Q. Did they tell you what your level was based on the organization.  19 Q. Did they tell you what your level was based on?  10 Dased on?  11 A. No, I just assumed that's how they based on?  12 Came to conclude it. You know, I had 30-plus years of experience in financial services. I had worked with, you know, CBOs, a close advisor to CBOs. In my McKinsey time I also worked with  10 Page 67  11 STUART BRESIOW - Tinancial institutions globally and in times of crisis. So I you know, they thought I was sufficiently senior.  12 Seven even my time at Google, you think the regulators along with senior people, so that's I don't know. Didn't seem didn't surprise me I was a Level 9.  12 Q. At the time you were hired, did answere of the page of the factors that were dictating what your salary, bowns, and compensation was?  13 A. No, No.  14 A. No to my recollection.  15 A. Not to my recollection.  16 A. Not to my recollection.  18 A. Not to my recollection.  19 A. Not to my recollection.  10 MR. GMOE: O'pection.  10 Page 69  11 Factors that were dictating what your salary, 10 pectically senior.  12 O. What was your reporting line in the position you held at the time you spined Google?  13 A. Yeah.  14 A. I reported to Tari SERSIOW -  15 Q. What was your reporting line in the position you held at the time you pioned Google?  16 A. No. Well was your reporting line in the position you held at the time you say that again. There was some paper shuffling, Cara.  17 Cara.  18 A. I reported to Tari SERSIOW -  20 D. You were hit was the time?  21 A. Well, he was or he was corposited to Tari Shaukat.  22 O. Do you know what his level was?  23 Do you know what his level was?  24 A. I reported to Tari Shaukat.  25 O. Do you know what his level was?  26 The was a Level 9.  27 A. Well, he was or he was corposited for Google evaluation of the was corposited for Google evaluation of	13	A. I don't know that.	13	Q. And do you know what your ladder was?
15 level?  A. No. I assume my level was based on the organization.  9 Q. Did they tell you what your level was based on the organization.  9 Q. Did they tell you what your level was based on the organization.  19 Q. Did they tell you what your level was based on?  10 Dased on?  11 A. No, I just assumed that's how they based on?  12 Came to conclude it. You know, I had 30-plus years of experience in financial services. I had worked with, you know, CBOs, a close advisor to CBOs. In my McKinsey time I also worked with  10 Page 67  11 STUART BRESIOW - Tinancial institutions globally and in times of crisis. So I you know, they thought I was sufficiently senior.  12 Seven even my time at Google, you think the regulators along with senior people, so that's I don't know. Didn't seem didn't surprise me I was a Level 9.  12 Q. At the time you were hired, did answere of the page of the factors that were dictating what your salary, bowns, and compensation was?  13 A. No, No.  14 A. No to my recollection.  15 A. Not to my recollection.  16 A. Not to my recollection.  18 A. Not to my recollection.  19 A. Not to my recollection.  10 MR. GMOE: O'pection.  10 Page 69  11 Factors that were dictating what your salary, 10 pectically senior.  12 O. What was your reporting line in the position you held at the time you spined Google?  13 A. Yeah.  14 A. I reported to Tari SERSIOW -  15 Q. What was your reporting line in the position you held at the time you pioned Google?  16 A. No. Well was your reporting line in the position you held at the time you say that again. There was some paper shuffling, Cara.  17 Cara.  18 A. I reported to Tari SERSIOW -  20 D. You were hit was the time?  21 A. Well, he was or he was corposited to Tari Shaukat.  22 O. Do you know what his level was?  23 Do you know what his level was?  24 A. I reported to Tari Shaukat.  25 O. Do you know what his level was?  26 The was a Level 9.  27 A. Well, he was or he was corposited for Google evaluation of the was corposited for Google evaluation of	14	Q. Did you negotiate with Google your	14	
16 A. No. I assume my level was based on my years of experience and my, you know, value to the organization. 19 Q. Did they tell you what your level was 20 Description. 19 Q. Did they tell you what your level was 20 Description. 20 based on? 21 A. No, I just assumed that's how they 22 came to conclude it. You know, I had 30-plus 23 years of experience in financial services. I had 24 worked with, you know, CEOs, a close advisor to 25 CEOs. In my McKinsey time I also worked with 25 A. Yeah.  Page 67  1 STURRY BRESLOW - 1 financial institutions globally and in times of 25 crisis. So I you know, they thought I was 3 sufficiently senior. 26 know, I met with very senior people at Google, you 26 know, I met with very senior people at Google, I 3 met with regulators along with senior people, so 3 that's I don't know. Didn't seem didn't 3 surprise me I was a Level 9. 9 Perrand and he I think his corporate title 3 assumptions. 10 Q. At the time you were hired, did 3 anyone on behalf of Google explain to you the factors that were dictating what your salary, 13 hours, and compensation was? 14 hours. 16 only by hypothesis that if if I assumptions. 16 only by hypothesis that if if I was 9, No. 16 only by hypothesis that if if I was 9, No. 17 the VITNESS: Sorry, Hope. 19 A. No. 20 At the time you joined Google, what 19 A. No. 21 would be responsible for building a global team to work with oustcares and partners across 10 industries? 24 A. You're talking about at the time I would be responsible for building a global team to work with oustcares and partners across 10 industries? 24 A. You're talking about at the time I would be responsible for building a global team to work with oustcares and partners across 10 industries? 24 A. You're talking about at the time I would be responsible for building a global team to work with oustcares and partners across 10 industries? 24 A. You're talking about at the time I would be responsible for building a global team to work with oustcares and partners across 10 industr	15	level?	15	Q. Was your ladder ever shared with you?
17 my years of experience and my, you know, value to the organization. 18 my companization. 19 Q. Did they tell you what your level was 19 A. Not to my recollection. 10 hased on? 11 A. No, I just assumed that's how they 21 came to conclude it. You know, I had 30-plus 22 ms. CASE. I'm sorry, can you say 23 years of experience in financial services. I had 24 worked with, you know, CEDs, a close advisor to 25 CEOs. In my McKinsey time I also worked with 25 A. Yeah.  Page 67 1 -STURKT BRESION - 1 organizational institutions globally and in times of 3 crisis. So I - you know, they thought I was 3 crisis. So I - you know, they thought I was 3 that's I don't know. Didn't seem didn't 3 surprise me I was a Level 9. 10 Q. To be clear, though: No one at 10 Google ever communicated to you the basis for your 12 level; is that correct? 12 Q. Do you know what his level was? 14 was 9, he had to be 10. 19 A. No. No. 19 A. No. 20 What's it called. Industry 24 A. You're talking about at the time I worked with customers and partners across 1 industries? 14 A. You're talking about at the time I worked with customers and partners across 1 industries? 14 A. You're talking about at the time I and some processing the properting line in the 21 position you held at the time you joined Google? MR. GAGE: Objection. 20 What was your reporting line in the 21 position you held at the time your joined Google? A. Yeah.  Page 67 2 Q. What was your reporting line in the 22 D. What's as your reporting line in the 22 D. What's as your reporting line in the 23 position you held at the time you joined Google? A. I reported to Tariq Shaukat. S. Do you know what Mr. Shaukat's title was at the time? 2 D. Do you recall what Mr. Shaukat's title was at the time? 3 D. Do you know what his level was co-president of Google Cloud along with P.H. Servand and he I think his corporate title was was senior VP, but I don't remember that for sure. Servand and he I think his corporate title wa	16	A. No. I assume my level was based on	16	-
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20	19	O. Did they tell you what your level was	19	·
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years of experience in financial services. I had worked with, you know, CEOs, a close advisor to CEOs. In my McKinsey time I also worked with  Page 67  Page 67  STUART BRESLOW - Financial institutions globally and in times of crisis. So I you know, they thought I was sufficiently senior.  Even even my time at Google, you fand, I met with regulators along with senior people, so that's I don't know. Didn't seem didn't surprise me I was a Level 9.  Q. To be clear, though: No one at Google ever communicated to you the basis for your level; is that correct?  A. Right, other than through my assumptions.  Q. At the time you were hired, did anyone on behalf of Google explain to you the factors that were dictating what your salary, bonus, and compensation was?  A. No. No.  THE WITNESS: Sorry, Hope.  A. What's it called. Industry  12  worked with, you know, CEOs, a close advisor to CEOs. In my McKinsey time I also worked with 24 Cara.  24  Cara.  25  A. Yeah.  Cara.  26  A. Yeah.  Cara.  27  A. Welh, what again. There was some paper shuffling, and cara.  A. Yeah.  Page 69  - STUART BRESLOW -  Q. What was your reporting line in the spoiling to the you position you held at the time you poined Google?  A. I reported to Tarig Shaukat.  Q. Do you recall what Mr. Shaukat's title was was senior VP, but I don't remember that for sure.  10  was was senior VP, but I don't remember that for sure.  11  for sure.  12  Q. Do you know what his level was?  A. Only by hypothesis that if if I was 9, he had to be 10.  Q. At the time you were hired, did  17  the customer-facing regulatory and compliance engagement for Google Cloud globally?  A. No.  Q. Was it your understanding that you work with customers and partners across industries?  28  work with customers and partners across industries?  29  work with customers and partners across industries?				
24 worked with, you know, CEOs, a close advisor to 25 CEOs. In my McKinsey time I also worked with  26 Page 67  1 - STUART ERESION - 2 financial institutions globally and in times of 3 crisis. So I you know, they thought I was 4 sufficiently senior. 5 Even even my time at Google, you 6 know, I met with very senior people at Google. I 7 met with regulators along with senior people, so 8 that's I don't know. Didn't seem didn't 9 surprise me I was a Level 9.  10 Q. To be clear, though: No one at 11 Google ever communicated to you the basis for your 12 level; is that correct? 13 A. Right, other than through my 14 assumptions. 15 Q. At the time you were hired, did 16 anyone on behalf of Google explain to you the 17 factors that were dictating what your salary, 18 bonus, and compensation was? 19 A. No. 20 THE WITNESS: Sorry, Hope. 21 A. What's it called. Industry 24 A. Wat's it called. Industry 24 A. Yeah.  Page 67  A. Yeah.  Page 69  - STUART BRESLOW - 2 Q. What was your reporting line in the position you held at the time you incle Google? 4 A. I reported to Tariq Shaukat. 5 Q. Do you recall what Mr. Shaukat's 6 title was at the time? 7 A. Well, he was co he was 8 to-president of Google Cloud along with P.H. 9 Ferrand and he I think his corporate title 10 was was senior VP, but I don't remember that 11 Google ever communicated to you the basis for your 12 Q. Do you know what his level was? 13 A. Only by hypothesis that if if I 14 was 9, he had to be 10. 15 Q. Now, at the time you were hired, was 16 it your understanding that you were hired to lead 17 factors that were dictating what your salary, 18 bonus, and compensation was? 19 A. No. 20 Q. Was it your understanding that you 21 A. No. 22 Q. At the time you joined Google, what 23 group or organizational unit did you work in? 24 A. What's it called. Industry 25 A. You're talking about at the time I				
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Page 67  1 -STUART BRESLOW - 2 financial institutions globally and in times of 3 crisis. So I you know, they thought I was 4 sufficiently senior. 5 Even even my time at Google, you 6 know, I met with very senior people at Google. I 7 met with regulators along with senior people, so 8 that's I don't know. Didn't seem didn't 9 surprise me I was a Level 9. 9 Ferrand and he I think his corporate title 10 Q. To be clear, though: No one at 11 Google ever communicated to you the basis for your 12 level; is that correct? 13 A. Right, other than through my 14 assumptions. 15 Q. At the time you were hired, did 16 anyone on behalf of Google explain to you the 17 factors that were dictating what your salary, 18 bonus, and compensation was? 19 A. No. 20 The WINNESS: Sorry, Hope. 21 A. No. 22 Q. At the time you joined Google, what 23 group or organizational unit did you work in? 24 A. What's it called. Industry 24 A. You're talking about at the time I				
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25 plat industry was it vertical platforms and   25 was hired?	10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. To be clear, though: No one at Google ever communicated to you the basis for your level; is that correct?  A. Right, other than through my assumptions.  Q. At the time you were hired, did anyone on behalf of Google explain to you the factors that were dictating what your salary, bonus, and compensation was?  A. No. No.  THE WITNESS: Sorry, Hope.  A. No.  Q. At the time you joined Google, what group or organizational unit did you work in?	10 11 12 13 14 15 16 17 18 19 20 21 22 23	Ferrand and he I think his corporate title was was senior VP, but I don't remember that for sure.  Q. Do you know what his level was? A. Only by hypothesis that if if I was 9, he had to be 10.  Q. Now, at the time you were hired, was it your understanding that you were hired to lead the customer-facing regulatory and compliance engagement for Google Cloud globally?  A. No.  Q. Was it your understanding that you would be responsible for building a global team to work with customers and partners across industries?
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	Page 70		Page 72
1	Page 70 - STUART BRESLOW -	1	Page 72   - STUART BRESLOW -
2	Q. Yes.	2	posed, it suggested that that it was that to
3	A. That was one component of the job	3	the exclusion of all other things. That was one
4	that I was hired to do, yes.	4	component of what I was doing; that was not the
5	Q. At the time you you were hired,	5	sole purpose of the role.
6	did you understand that you were expected to work	6	So the things you've now detailed are
7	closely with the product and engineering teams in	7	things that were were well within the ambit of
8	GT and GPT?	8	my responsibility there, but I understood that
9	A. Yes.	9	question to mean are you were you singularly
10	Q. At the time you were hired, did you	10	doing a regulatory compliance role at Google Cloud
11	understand that you were being hired into a role	11	and the answer was no. It was all those other
12	that was primarily focused on regulatory and	12	things that you just set out.
13	compliance work?	13	Q. Let me just say it one more time and
14	A. No.	14	then you can answer yes or no whether it's true or
15	Q. Did you understand it to be an	15	not true. Was it your understanding that your
16	engineering role?	16	role was to lead regulatory and compliance on the
17	A. No.	17	business and customer side for Google Cloud?
18	Q. Was it your understanding that you	18	MR. GAGE: Objection.
19	would be responsible for working with customers	19	A. Could you say it again?
20	and partners to explain how Google Cloud meets	20	Q. Yes. Was it your understanding that
21	their compliance and regulatory needs?	21	your role was to lead regulatory and compliance on
22	A. Yes.	22	the business and customer side for Google Cloud?
23	Q. Was it your understanding that you	23	MR. GAGE: Objection.
24	would be responsible for creating a plan for what	24	A. At the time I was hired, yes? Ms.
25	certifications and approvals were needed to	25	Greene, at the time I was hired? I'm asking you a
,	Page 71	_	Page 73
1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	- STUART BRESLOW - maximize market traction?	2	- STUART BRESLOW - question.
2 3	- STUART BRESLOW - maximize market traction? A. No.	2	- STUART BRESLOW - question. Q. Is that a question?
2 3 4	- STUART BRESLOW - maximize market traction?  A. No.  Q. Did you understand at the time you	2 3 4	- STUART BRESLOW - question. Q. Is that a question? A. Yes, that's a question.
2 3 4 5	- STUART BRESLOW - maximize market traction? A. No. Q. Did you understand at the time you were hired that your responsibilities included	2 3 4 5	- STUART BRESLOW - question. Q. Is that a question? A. Yes, that's a question. Q. Yes. At the time you were hired, was
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	Page 74		Page 76
1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	groundbreaking development?	2	function, business, and/or industry through advice
3	A. You bet.	3	counsel related to Google technologies and
4	Q. Was a qualification that you work on	4	business strategies?
5	one or more of the company's most complex projects	5	A. Yes.
6	and/or problems?	6	Q. Was another that you act as a
7	A. Yes.	7	technical advisor to several project teams?
8	Q. Was a qualification that you be able	8	A. Yes.
9	to translate business needs into actionable	9	Q. Was another that you consult on
10	initiatives?	10	projects and/or people transitions?
11	A. Sure.	11	A. Yes.
12	Q. Was another qualification that you be	12	Q. Was another that you impact Google's
13	able to anticipate and solve problems across	13	long-term direction and success by contributing to
14	functional groups?	14	setting strategy objectives for key functional
15	A. That's what I've done for my whole	15	areas?
16	career, yeah.	16	A. Yes.
17	Q. Was another qualification that you be	17	Q. Was another that you shape the
18	able to own several complex projects and fully	18	direction and future of the function?
19	commit to their success?	19	A. Yes.
20	A. Yes. Again, that's what I did	20	Q. Was another to ensure that product
21	throughout my entire career.	21	and services are aligned with Google's current and
22	Q. Is another qualification that you	22	future needs and expectations?
23	would be able to apply advanced judgment to	23	A. Yes.
24	develop new solutions and think beyond existing	24	Q. Was another that you impact Google's
25	resolutions, assumptions, or current knowledge of	25	long-term direction and success well, you
		1	
1	Page 75	1	Page 77
1 2	- STUART BRESLOW -	1 2	- STUART BRESLOW -
2	- STUART BRESLOW - the area and industry?	2	- STUART BRESLOW - already said yes to that.
2 3	- STUART BRESLOW - the area and industry? A. Yeah, that's what senior executives	2 3	- STUART BRESLOW - already said yes to that. Was another that you shape the
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2 3	- STUART BRESLOW - the area and industry? A. Yeah, that's what senior executives do. That's yeah, that's what I was hired to do.	2 3 4	- STUART BRESLOW - already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and
2 3 4 5	- STUART BRESLOW -  the area and industry?  A. Yeah, that's what senior executives  do. That's yeah, that's what I was hired to  do.  Q. Was another qualification that you	2 3 4 5 6	- STUART BRESLOW - already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and implementing groundbreaking technologies?
2 3 4 5 6 7	- STUART BRESLOW -  the area and industry?  A. Yeah, that's what senior executives  do. That's yeah, that's what I was hired to  do.  Q. Was another qualification that you contribute to setting strategy objectives to the	2 3 4 5 6 7	- STUART BRESLOW - already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and implementing groundbreaking technologies?  A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	the area and industry?  A. Yeah, that's what senior executives do. That's yeah, that's what I was hired to do.  Q. Was another qualification that you contribute to setting strategy objectives to the function?  A. Yeah.  Q. Was another qualification that you arbitrate and advocate the technical issues?  A. You better believe it.  Q. Was another that you grow the gold senior level talent pipeline?  A. Uh-huh. Yes.  Q. Was another that you have proven mastery of communication, negotiation, and influence skills?  A. That was my you summed up my career in an in an in whatever, ten words.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and implementing groundbreaking technologies?  A. Yes.  Q. In your role at the time you joined Google, did you understand your responsibilities to include partnering closely with top global companies as their most trusted Google technical advisor?  A. The yes. Though the one quibble might be around technical advisor but, yes, that was the idea was for me to be a point of contact for important clients in regulated industries and their senior executives.  Q. And what's the quibble around technical advisor?  A. Just just a question of what you
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	the area and industry?  A. Yeah, that's what senior executives do. That's yeah, that's what I was hired to do.  Q. Was another qualification that you contribute to setting strategy objectives to the function?  A. Yeah.  Q. Was another qualification that you arbitrate and advocate the technical issues?  A. You better believe it.  Q. Was another that you grow the gold senior level talent pipeline?  A. Uh-huh. Yes.  Q. Was another that you have proven mastery of communication, negotiation, and influence skills?  A. That was my you summed up my career in an in an in whatever, ten words.  Q. Was another that you provide input to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and implementing groundbreaking technologies?  A. Yes.  Q. In your role at the time you joined Google, did you understand your responsibilities to include partnering closely with top global companies as their most trusted Google technical advisor?  A. The yes. Though the one quibble might be around technical advisor but, yes, that was the idea was for me to be a point of contact for important clients in regulated industries and their senior executives.  Q. And what's the quibble around technical advisor?  A. Just just a question of what you mean by "technical."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	the area and industry?  A. Yeah, that's what senior executives do. That's yeah, that's what I was hired to do.  Q. Was another qualification that you contribute to setting strategy objectives to the function?  A. Yeah.  Q. Was another qualification that you arbitrate and advocate the technical issues?  A. You better believe it.  Q. Was another that you grow the gold senior level talent pipeline?  A. Uh-huh. Yes.  Q. Was another that you have proven mastery of communication, negotiation, and influence skills?  A. That was my you summed up my career in an in an in whatever, ten words.  Q. Was another that you provide input to executives?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and implementing groundbreaking technologies?  A. Yes.  Q. In your role at the time you joined Google, did you understand your responsibilities to include partnering closely with top global companies as their most trusted Google technical advisor?  A. The yes. Though the one quibble might be around technical advisor but, yes, that was the idea was for me to be a point of contact for important clients in regulated industries and their senior executives.  Q. And what's the quibble around technical advisor?  A. Just just a question of what you mean by "technical."  Q. What do you understand it to mean?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	the area and industry?  A. Yeah, that's what senior executives do. That's yeah, that's what I was hired to do.  Q. Was another qualification that you contribute to setting strategy objectives to the function?  A. Yeah.  Q. Was another qualification that you arbitrate and advocate the technical issues?  A. You better believe it.  Q. Was another that you grow the gold senior level talent pipeline?  A. Uh-huh. Yes.  Q. Was another that you have proven mastery of communication, negotiation, and influence skills?  A. That was my you summed up my career in an in an in whatever, ten words.  Q. Was another that you provide input to executives?  A. Uh-huh. Yes. Sorry, no uh-huh.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and implementing groundbreaking technologies?  A. Yes.  Q. In your role at the time you joined Google, did you understand your responsibilities to include partnering closely with top global companies as their most trusted Google technical advisor?  A. The yes. Though the one quibble might be around technical advisor but, yes, that was the idea was for me to be a point of contact for important clients in regulated industries and their senior executives.  Q. And what's the quibble around technical advisor?  A. Just just a question of what you mean by "technical."  Q. What do you understand it to mean?  A. Well, I understand it to mean to help
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	the area and industry?  A. Yeah, that's what senior executives do. That's yeah, that's what I was hired to do.  Q. Was another qualification that you contribute to setting strategy objectives to the function?  A. Yeah.  Q. Was another qualification that you arbitrate and advocate the technical issues?  A. You better believe it.  Q. Was another that you grow the gold senior level talent pipeline?  A. Uh-huh. Yes.  Q. Was another that you have proven mastery of communication, negotiation, and influence skills?  A. That was my you summed up my career in an in an in whatever, ten words.  Q. Was another that you provide input to executives?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	already said yes to that.  Was another that you shape the direction and future of the organization and industry by designing, developing, and implementing groundbreaking technologies?  A. Yes.  Q. In your role at the time you joined Google, did you understand your responsibilities to include partnering closely with top global companies as their most trusted Google technical advisor?  A. The yes. Though the one quibble might be around technical advisor but, yes, that was the idea was for me to be a point of contact for important clients in regulated industries and their senior executives.  Q. And what's the quibble around technical advisor?  A. Just just a question of what you mean by "technical."  Q. What do you understand it to mean?

1			
1	Page 78 - STUART BRESLOW -	1	Page 80 - STUART BRESLOW -
2	calling calling me to talk about, you know, how	2	include public evangelism for emerging
3	do you program something, the answer is no. Again	3	technologies and speaking publicly on those
	as we established earlier. I don't code and I	4	issues?
4	· · · · · · · · · · · · · · · · · · ·	5	
5	don't program, but I do deal with senior		
6	executives all the time. That's what I do.	6	Q. Did it involve doing deep dives with
7	Q. With respect to your responsibilities	7	internal engineering teams on the key cases for a
8	in the role that you were hired into	8	given launch?
9	A. Uh-huh.	9	A. Yes.
10	Q is one of your responsibilities	10	Q. Did it include leading a cross-Google
11	identifying Cloud-related designs, development, or	11	technical working team through a critical
12	deployment friction points from the customers'	12	engagement or through critical engagements?
13	perspective and rallying your teams to work	13	A. I'm sorry, say it again. I I
14	through solutions?	14	wasn't following.
15	A. I'm sorry, I missed one word in	15	Q. Did it include leading a cross-Google
16	there. I apologize.	16	technical working team through critical
17	Q. Sure. Did it include identifying	17	engagements to customers?
18	Cloud-related design, development, or deployment	18	A. Yes.
19	friction points	19	Q. In your role, did you need to be at
20	A. Oh, friction point. Okay, that	20	home in a public speaking or a stage-type role?
21	what's I didn't hear. Thank you.	21	MR. GAGE: Objection.
22	Q from the customers' perspective	22	A. Did I need to be in my apartment in a
23	and rally teams to work through solutions?	23	public speaking engagement?
24	A. Yes, absolutely.	24	Q. In your role, did you need to be at
25	Q. Was one of your responsibilities to	25	home on stage?
	Page 79		Page 91
1	Page 79 - STUART BRESLOW -	1	Page 81 - STUART BRESLOW -
1 2		1 2	-
	- STUART BRESLOW -		- STUART BRESLOW -
2	- STUART BRESLOW - work with customers and partners to define joint	2	- STUART BRESLOW - MR. GAGE: Objection.
2 3	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road	2 3	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable
2 3 4	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?	2 3 4	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?
2 3 4 5	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map? A. Absolutely.	2 3 4 5	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?
2 3 4 5	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities	2 3 4 5	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.
2 3 4 5 6 7	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help	2 3 4 5 6 7	- STUART BRESLOW - MR. GAGE: Objection. A. What does that mean? Q. Did you need to be comfortable presenting publicly in your role? A. Sure. Q. Did you need to be comfortable or
2 3 4 5 6 7 8	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies	2 3 4 5 6 7 8	- STUART BRESLOW - MR. GAGE: Objection. A. What does that mean? Q. Did you need to be comfortable presenting publicly in your role? A. Sure. Q. Did you need to be comfortable or qualified to provide private consultations with a
2 3 4 5 6 7 8	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?	2 3 4 5 6 7 8	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.
2 3 4 5 6 7 8 9	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption? A. Yes.	2 3 4 5 6 7 8 9	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.
2 3 4 5 6 7 8 9 10	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption? A. Yes. Q. Was part of your responsibilities to collaborate across functional and product area	2 3 4 5 6 7 8 9 10	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable  presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or  qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the Box.
2 3 4 5 6 7 8 9 10 11 12	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption? A. Yes. Q. Was part of your responsibilities to	2 3 4 5 6 7 8 9 10 11	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable  presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or  qualified to provide private consultations with a  trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the  Box.
2 3 4 5 6 7 8 9 10 11 12 13	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption? A. Yes. Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the	2 3 4 5 6 7 8 9 10 11 12	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the Box.  A. Okay, give me a second. Okay, so I need to refresh it again?
2 3 4 5 6 7 8 9 10 11 12 13 14	- STUART BRESLOW - work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption? A. Yes. Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable  presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or  qualified to provide private consultations with a  trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the  Box.  A. Okay, give me a second. Okay, so I
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely.  Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes.  Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes.  Q. With respect to the role in which you	2 3 4 5 6 7 8 9 10 11 12 13 14 15	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable  presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or  qualified to provide private consultations with a  trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the  Box.  A. Okay, give me a second. Okay, so I  need to refresh it again?  Q. Yes, please.  A. Give me one second.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely.  Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes.  Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes.  Q. With respect to the role in which you were hired at Google, did your days include	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the Box.  A. Okay, give me a second. Okay, so I need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes. Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes. Q. With respect to the role in which you were hired at Google, did your days include private whiteboarding sessions with Google	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the Box.  A. Okay, give me a second. Okay, so I need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?  Q. Let me make sure I've got the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes. Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes. Q. With respect to the role in which you were hired at Google, did your days include private whiteboarding sessions with Google customers?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable  presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or  qualified to provide private consultations with a  trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the  Box.  A. Okay, give me a second. Okay, so I  need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?  Q. Let me make sure I've got the  right
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely.  Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes.  Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes.  Q. With respect to the role in which you were hired at Google, did your days include private whiteboarding sessions with Google customers?  A. I'm sorry, you're asking whether the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable  presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or  qualified to provide private consultations with a  trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the  Box.  A. Okay, give me a second. Okay, so I  need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?  Q. Let me make sure I've got the  right  A. So I've got Tab 32 says "Solutions
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely.  Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes.  Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes.  Q. With respect to the role in which you were hired at Google, did your days include private whiteboarding sessions with Google customers?  A. I'm sorry, you're asking whether the role contemplated it or whether I did it?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the Box.  A. Okay, give me a second. Okay, so I need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?  Q. Let me make sure I've got the right  A. So I've got Tab 32 says "Solutions Consultant," Tab 33 says "Technical Solutions
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes. Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes. Q. With respect to the role in which you were hired at Google, did your days include private whiteboarding sessions with Google customers?  A. I'm sorry, you're asking whether the role contemplated it or whether I did it? Q. Whether the role either contemplated	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the Box.  A. Okay, give me a second. Okay, so I need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?  Q. Let me make sure I've got the right  A. So I've got Tab 32 says "Solutions Consultant," Tab 33 says "Technical Solutions Consultant," Tab 34 says "GOOG-ROWE-5197."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely.  Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes.  Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes.  Q. With respect to the role in which you were hired at Google, did your days include private whiteboarding sessions with Google customers?  A. I'm sorry, you're asking whether the role contemplated it or whether I did it?  Q. Whether the role either contemplated it or in fact you did it.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the  Box.  A. Okay, give me a second. Okay, so I need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?  Q. Let me make sure I've got the  right  A. So I've got Tab 32 says "Solutions Consultant," Tab 33 says "Technical Solutions Consultant," Tab 34 says "GOOG-ROWE-5197."  Q. Okay. If you can, open Tab 32.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	work with customers and partners to define joint initiative and co-create their transformation road map?  A. Absolutely. Q. Was part of your responsibilities to tell the Google innovation story and help translate it to actionable steps global companies can take towards adoption?  A. Yes. Q. Was part of your responsibilities to collaborate across functional and product area boundaries to bring the best of Google to the customer?  A. Yes. Q. With respect to the role in which you were hired at Google, did your days include private whiteboarding sessions with Google customers?  A. I'm sorry, you're asking whether the role contemplated it or whether I did it? Q. Whether the role either contemplated	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	- STUART BRESLOW -  MR. GAGE: Objection.  A. What does that mean?  Q. Did you need to be comfortable presenting publicly in your role?  A. Sure.  Q. Did you need to be comfortable or qualified to provide private consultations with a trusted advisor?  A. Yes.  Q. Okay. If you can, go back to the Box.  A. Okay, give me a second. Okay, so I need to refresh it again?  Q. Yes, please.  A. Give me one second.  Okay, so there's now 32, 33 and 34?  Q. Let me make sure I've got the right  A. So I've got Tab 32 says "Solutions Consultant," Tab 33 says "Technical Solutions Consultant," Tab 34 says "GOOG-ROWE-5197."

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Page 130
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 1
                       - STUART BRESLOW -
                                                             1
                                                                                    - STUART BRESLOW -
2
           A.
                   So I just want you aware: They --
                                                             2
                                                                                MR. GAGE: Objection.
 3
       they asked that I delay -- delay more time so Hope
                                                                                THE WITNESS: I'm sorry, I apologize.
 4
       could get the words -- even though I'm leaving
                                                                                A few times over the course of the
5
       time, I'm not leaving enough so I'm going to leave
                                                             5
                                                                   months.
 6
       a little more time, just so you know.
                                                                                Did he tell you what efforts Google
7
                   So -- so the -- so I became the --
                                                             7
                                                                    was undertaking to fill the role?
8
       the head of financial services vertical.
                                                             8
                                                                                I knew that he was actively
9
                   And what organization or
                                                             9
                                                                    interviewing candidates for the role and that I
10
       organizational unit was that in at -- at Google?
                                                                   knew that at some point he -- he or people offsite
                                                            10
11
                   It was in Tarig Shaukat's
                                                                    presented some of the candidates to Diane Greene.
                                                            11
12
       organization, which was industry -- I forget what
                                                            12
                                                                                Do you know who those candidates
       it's called. You know, industry verticals and
                                                                    were?
13
                                                            13
14
       global alliances or something like that.
                                                            14
                                                                        Α.
15
                   And what -- did you continue to
                                                            15
                                                                        Q.
                                                                                Do you know the background or
16
       report to Mr. Shaukat in that position?
                                                            16
                                                                   experience of the candidates?
17
           Α.
                                                            17
                                                                        A.
18
            0.
                   How did it come to be that you moved
                                                            18
                                                                        0.
                                                                                Do you know whether Ms. Rowe was a
19
       into the position of head of financial services
                                                            19
                                                                    candidate?
20
       vertical?
                                                            2.0
                                                                        A.
                                                                                I did come to understand that, yes.
21
           Α.
                   We spoke -- I don't know whether it
                                                            21
                                                                        Ο.
                                                                                When did you come to understand that?
22
                                                            22
                                                                        Α.
                                                                                Sometime -- sometime around the time
       was in person or on a hangout or on the phone --
23
       and he asked if I would take the role.
                                                            23
                                                                    I accepted the role.
24
                                                                                How did you come to learn that?
                   And when you say "he," who are you
                                                            24
                                                                        Q.
25
                                                            25
                                                                                Don't recall specifically, but I
       referring to?
                                                                        Α.
                                                Page 131
                                                                                                             Page 133
                                                                                    - STUART BRESLOW -
1
                       - STUART BRESLOW -
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 2
           A.
                   Oh, I'm sorry. Tariq.
                                                                   assume it was from Tariq.
 3
                   And when was that?
                                                             3
                                                                                Your discussions with Mr. Shaukat
 4
            Α.
                   Again, sometime December or January.
                                                             4
                                                                    around the head of financial services vertical
5
       I just don't remember specifically when.
                                                                    role, was that in the context of a broader
 6
                   How close in time was it to you
                                                                    reorganization of Tariq's group?
 7
       assuming the role?
                                                             7
                                                                                You mean when he asked me to take on
8
                   Well, basically upon agreeing to do
                                                             8
                                                                    the role or -- or my comments earlier than that?
9
       it, I assumed it. There's then the gap to when it
                                                                                Either. Any of the times you
                                                             9
10
       was announced.
                                                            10
                                                                    discussed with him the financial services vertical
11
                   And how long was the gap between when
                                                            11
                                                                    role, was it in the context of talking about a
                                                                   broader reorganization?
12
      you assumed it and when it was announced?
                                                            12
13
                   I don't recall, but from the
                                                            13
                                                                                Well, the -- in connection
14
       documents you showed me this morning it suggested
                                                            14
                                                                    with -- so, again, remembering that I was hired
15
       it was a significant period of time.
                                                            15
                                                                    for purposes of this, this role to get Google
16
            Ο.
                   Prior to that call or hangout with
                                                            16
                                                                    Cloud -- to create a strategy for Google Cloud
17
       Mr. Shaukat, had you discussed the head of
                                                            17
                                                                    with regulated industries and then cause that to
18
       financial services vertical role with him before?
                                                            18
                                                                    be executed, I thought since financial services
19
                   Only in the sense that it was -- it
                                                            19
                                                                    was probably the anchor of that we really needed
20
       was unfilled and I thought it was important to
                                                            20
                                                                    someone to fill that role.
21
       have it filled. I did not put myself forth as a
                                                            21
                                                                                And I had a distinct role that
22
       candidate for it.
                                                                    was -- either role, it was distinct from that.
                                                            22
23
                   When did you have that discussion
                                                            23
                                                                   Mine was, as I think you pointed out earlier,
            Ο.
       with him?
                                                                    across the verticals and then -- so that's -- we
24
                                                            24
25
           A.
                  A few --
                                                                    did talk about that. And then, you know, once he
```

1	Page 13-	4 1	Page 136 - STUART BRESLOW -
2	asked me to take on the role, I you know, we	2	would require you to execute strategies from a
3	obviously talked about it again then, too.	3	technical and business perspective?
4	O. Did Mr. Shaukat tell you what the	4	A. Yes.
5	role entailed in that conversation where he asked	5	Q. Did you understand that the role
6	if you would take the role?	6	required extensive experiencing in managing
7	A. No, he didn't have to tell me what it	7	information technology?
8	was. I I knew I knew what the role	8	A. Yes.
9	entailed having I was already at Google Cloud	9	Q. Did you understand that the role
10	for probably six months and I saw what the other	10	required extensive experiencing in managing
11	vertical leads did and I didn't you know,	11	computer systems that support enterprise goals?
12	again, he was basically saying, you know, I need a	12	A. No.
13	senior executive in that role to, you know, bring	13	Q. Did you understand that the role
14	coherence to it and so that's what I what I	14	required a Ph.D. or a Master of Science degree in
15	did.	15	computer science or related technical field?
16	Q. Did you get did he give you or	16	A. No.
17	provide you with a copy of the job description?	17	Q. In the context of Mr. Shaukat's
18	A. Not to my recollection.	18	organization, what did he discuss with you in late
19	Q. Did anyone at that time provide you	19	2018/early 2009 late 2018/early 2019 regarding
20	with a copy of the job description?	20	changes that he wanted to make to his
21	A. Not to my recollection.	21	organizational structure.
22	Q. Were you ever asked to interview for	22	A. I don't recall conversations about
23	the role?	23	that.
24	A. Not to my recollection.	24	Q. Okay. If you can go to the Box,
25	Q. Did you ever interview for the role?	25	we're looking for
1	Page 13 - STUART BRESLOW -	5   1	Page 137 - STUART BRESLOW -
2	A. Not to my recollection.	2	A. Hold on, I'm trying to find the Box.
3	Q. Now, with respect to that role did	3	Got it.
4	you understand that your responsibilities would	4	Q. Does it have Tab 15?
5	include driving Google's business by developing	5	A. Let me refresh it, hold on a second.
6	product solutions?	6	Tab 15, yes?
7	A. Yes.	7	Q. And
8	Q. Did you understand that your	8	A. Sorry. Tab 15 is what I'm looking
9	responsibilities in that role would include	9	for?
10	driving business by targeting by identifying	10	Q. Yes.
11	M&A targets?	11	A. Right, got it.
12	A. Yes.	12	Q. We're up to Exhibit 18, Bates stamped
13	Q. Did you understand that your role	13	GOOG-ROWE-00056729 through 730.
14	would include developing go-to market approaches	14	(Whereupon, Exhibit 18 was marked at
15	that would resonate with the major companies in	15	this time.)
16	the financial services?	16	Q. Mr. Breslow, do you recognize this
17	A. Yes.	17	document?
18	Q. Did you understand that the role	18	A. Yes, it's an e-mail.
19	required appropriate technical acumen as a crucial	. 19	Q. And you see that e-mail is dated
20	component?	20	October 13, 2019?
21	A. Yes.	21	A. Right, that's a year later than the
22	Q. Did you understand that the role	22	time frame you've been referring me to. That's a
23	required technical know-how?	23	year later than the period you've been referring
24	A. Yes.	24	me to.
25	Q. Did you understand that the role	25	Q. I understand. Thank you.
1	<del>-</del>		4

## Page 142 Page 144 - STUART BRESLOW -1 - STUART BRESLOW -1 2 2 And so it was subsequent to that that Q. And did he, in fact, use the word 3 Tariq said look, we're in this in-between period 3 "interim"? with a new CEO coming; I'm not inclined to go and He -- my recollection is he did. I 4 don't recall that with certainty. 5 recruit someone to come in and lead the financial 5 6 services vertical right now; you have a deep And did he tell you what would happen 7 financial services industry background; you know 7 to you at the time you would examine later on 8 how to engage with senior executives, you -- we've if it was -- if you weren't going to be in that 9 had a good relationship in terms of you've known 9 role permanently? 10 what to do and how to do it and how to progress 10 Α. I wasn't concerned about that. 11 important things here in the organization; you've My question was: Was it discussed? 11 12 made a lot of good contacts, created a good 12 I don't recall it because I wasn't 13 network and so would you become the head of the concerned about it. 13 14 financial vertical; and then we can re-examine 14 Q. Did Mr. Shaukat say whether he had later on wheth -- on an interim basis we can 15 15 spoken to anyone else with respect to putting you 16 examine later on whether you should become -- you 16 in the role? know, whether it's -- what we would do to fill 17 17 Α. Not that I recall. 18 that role on a more permanent basis, whether it's 18 0. Did you speak with anyone else with 19 you or somebody else. So that's how it came to 19 respect to you assuming that role? 20 20 A. I may have, but not that I recall. 21 And, you know, I was -- when asked to 21 Q. Did you have an understanding as to 22 serve I said, of course. I liked the opportunity 22 whether anyone, other than Mr. Shaukat, was 23 and I said yes and did it. There was no 23 involved in the decision to put you into that 24 additional compensation, there was no change to my role? 24 25 compensation, there was to change to my level, 25 Α. I didn't have an understanding anyone Page 143 Page 145 1 - STUART BRESLOW -1 - STUART BRESLOW -2 there was no change to my ladder; none of the other than Mr. Shaukat was involved. 3 things you have been pointing to earlier. It was In any of those conversations you 4 taking the job I was doing before and saying okay, 4 just described for me whether it was one or a 5 now this is the job you're doing. series of conversations, was Ms. Rowe discussed? 6 Is that in the conversation that you Not to my recollection. 7 described earlier where he asked if you wanted to Was there any conversation in 8 take the role? 8 connection with you taking on the head of 9 Yeah, it -- I suspect it was a financial services role where Ms. Rowe was 9 discussed? 10 couple -- I don't really recall whether it was 10 one conversation or two or three conversations. I'm sorry, is that a different 11 11 A. question than the one you just asked? 12 It was -- you know, it was a big deal to make the 12 13 change and so I suspect we had a couple of 13 0. It is. 14 conversations. I just don't recall with any 14 A. Can you repeat it then? I'm not 15 precision how many we had and, you know, 15 following. 16 which -- what -- what the -- what the substance 16 Sure. So, more generally, was -- in Ο. 17 was in each of the conversations, but that's 17 any conversation where your -- where your change 18 effectively the record of the conversations. 18 in role was discussed, was Ms. Rowe discussed? 19 Is there anything else that you 19 MR. GAGE: Objection. 20 recall him saying to you or you saying to him in 20 Well, at some point I came to know Α. 21 the context of him offering you or asking you to 21 that she had, you know, interviewed for the job 22 take on the role of head of financial services? 22 when Diane Greene was at -- at Google Cloud. So I 23 Not at this moment, but I expect 23 don't know -- I'm -- I'm sorry, I -- I apologize. I'm just not following the -- the question you're 24 there may be things that may refresh my 24

25

trying -- what you're trying to get at.

25

recollection.

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Page 146
                                                                                                             Page 148
 1
                       - STUART BRESLOW -
                                                             1
                                                                                    - STUART BRESLOW -
                                                             2
2
            Q.
                   We'll come back to it.
                                                                        A.
                                                                                With respect to regulatory
 3
            Α.
                   Okay.
                                                                   technology?
                   Aside from what you've already told
 4
                                                                        0.
                                                                                Deep expertise.
5
       me, did Mr. Shaukat communicate anything to you in
                                                                        A.
                                                                                Well, now you changed it to
 6
       addition about why he was selecting you for the
                                                                   "regulatory technology," right, that was your last
 7
       role?
                                                             7
                                                                   question?
 8
                   Yeah, I -- as I described, you know,
                                                             8
                                                                        Q.
                                                                               My last question.
           A.
 9
       he knew that I knew my way around the financial
                                                             9
                                                                                Right. Do I have deep expertise with
10
       services industry. I had -- he was well-aware of
                                                                   respect to regulatory technology? In terms of the
                                                            10
11
       my background.
                                                                   people who do this for a living, I have as good
                                                            11
12
                   I had been in financial services from
                                                            12
                                                                   a -- a knowledge of it as most anyone can.
13
       '87 to 2017. I had worked at the highest
                                                                               Do you have any understanding as to
                                                            13
                                                                   how your knowledge of regulatory technology
14
       levels of the industry. I've worked with senior
                                                            14
                                                                   compares to Ms. Rowe's knowledge?
15
       regulators, which was important to the role. He
                                                            15
16
       knew about my experience as a -- as a partner at
                                                            16
                                                                        A.
                                                                               No.
17
                                                                               Now, either internally or externally
       McKinsey because he, too, had been a partner at
                                                            17
18
       McKinsey and he knew what -- you know, what the
                                                            18
                                                                   did you designate yourself as the head of
19
       rigors are of being a partner at McKinsey and how
                                                            19
                                                                   financial services on an interim basis?
20
       one engages the senior executives at McKinsey; and
                                                            20
                                                                               MR. GAGE: Objection.
21
       he knew that I had -- he knew that I created in a
                                                            21
                                                                        Α.
                                                                               Did I designate myself? Not to my
22
       relatively short order a very strong network at
                                                            22
                                                                   recollection -- well, I'm sorry, you are
23
                                                            23
                                                                   asking -- is the keyword "interim" or "head of
       Google Cloud. I had people all over the
24
       organization who were looking to me for support
                                                                   financial" services or both?
                                                            24
25
                                                            25
                                                                               Let's -- let -- let me ask you a
       and guidance.
                                                Page 147
                                                                                                             Page 149
                       - STUART BRESLOW -
1
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                                                                                    - STUART BRESLOW -
 2
                   So -- and he was well-aware of those
                                                                   different question. One is: Did you tell people
 3
       things when we talked about the role.
                                                             3
                                                                   that you were the head of financial services on an
 4
                   At that time, did you consider
                                                             4
                                                                   interim basis?
5
       yourself to be an expert in technology?
                                                             5
                                                                        Α.
                                                                               May have.
 6
                   Excuse me --
                                                                                Who?
 7
                   MR. GAGE: Objection.
                                                             7
                                                                                I -- I -- I have no specific -- I'm
 8
                   I -- I don't know, and I'm not trying
                                                             8
                                                                   sorry the way I'm saying it, but I have no
9
       to be clever. I had sufficient expertise in
                                                                   specific recollection. Again, these are things
                                                             9
       technology to speak cogently with the customer
                                                                   that didn't matter to me.
10
                                                            10
       base at Google as well as with the sales force, as
                                                                                Did you -- when speaking of your
11
                                                            11
       well as with the engineers, as well as with the
                                                                   role, did you say head of financial services or
12
                                                            12
13
       in -- the infrastructure teams. So that's --
                                                            13
                                                                   interim the head of financial services?
                                                                                I said head of financial services.
14
       that's -- that was the level of expertise I needed
                                                            14
15
       to do my job.
                                                            15
                                                                        Ο.
                                                                               And is that how Mr. Shaukat also
16
                   Beyond having enough to speak
                                                            16
                                                                   referred to you?
17
       cogently about it, would you consider yourself to
                                                            17
                                                                        Α.
                                                                                I don't know.
18
       be an expert in technology?
                                                            18
                                                                               And in the head of financial services
                                                                        Ο.
19
           Α.
                   I --
                                                            19
                                                                   role, did you meet with Ruth Porat?
20
                   MR. GAGE: Objection.
                                                            20
                                                                               Well, I met with Ruth several times
21
           Α.
                   Yeah, my answer is my answer.
                                                            21
                                                                   while I was at Google Alphabet. We had a meeting
22
                   Do you consider yourself to have
                                                            22
                                                                                   who was the
                                                                   with
23
       deep, deep technological expertise with respect to
                                                                             , along with -- along with Thomas Kurian
24
       regulatory technology?
                                                                   and a couple of other people, and I presented on
                                                            24
25
                   MR. GAGE: Objection.
                                                            25
                                                                   the Cloud to a -- to a -- to and a couple
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Page 150
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 1
                       - STUART BRESLOW
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                                                                                   - STUART BRESLOW -
                                                             2
2
       of his colleagues. We met with
                                                                   financial services, but that she would have a
                                                                   broader role as OC -- in OCTO. It would not be
 3
       who was a senior a -- a senior official at the
                                                             3
 4
                                                                   one where she would effectively be doing financial
 5
       both Ruth and I knew from Morgan Stanley days, and
                                                                   services -- dedicated financial services work. In
 6
       we talked about the financial modernization and
                                                                   OCTO, she'd be covering many industries.
 7
       the role of Cloud in financial modernization.
                                                             7
                                                                               Prior to that -- when was that
8
                   In addition, the guy who was head of
                                                             8
                                                                   conversation?
 9
       compliance at GP abruptly resigned and Ruth called
                                                             9
                                                                               I don't recall specifically. It was
10
       me late on a Friday to say could I please get
                                                                   sometime after January and sometime before April.
                                                            10
11
       involved and figure out whether there were issues
                                                            11
                                                                               Prior to that, did you have any
12
       of concern there and how we might effectively
                                                            12
                                                                   discussions with Mr. Shaukat regarding Ms. Rowe
13
       ensure good controls at Google Pay; and in
                                                            13
                                                                   reporting in to you?
14
       addition, she asked me to help in the search for a
                                                            14
                                                                               MR. GAGE: Objection.
15
       successor for that person.
                                                            15
                                                                               We may have. Again, I was -- I -- I
                                                                        A.
16
                   So those are among the contacts I had
                                                            16
                                                                   probably told him I was happy to have her work
17
       with a -- with Ruth after -- after the -- and --
                                                            17
                                                                   with me. I -- you know, as I said to you earlier,
18
       and -- and I -- and, and, you know, after I became
                                                            18
                                                                   I -- I thought she was someone who I could work
19
       head of -- of the vertical, but they were not
                                                            19
                                                                   with and we really -- I could help advance her
20
       occasioned by me. She -- she found me and she
                                                            20
                                                                   career had she -- had she worked with me.
21
       knew me. We probably had, I don't know, three or
                                                            21
                                                                               Did you discuss with Mr. Shaukat what
22
                                                            22
                                                                   her responsibilities would be relative to yours?
       four hallway conversations as well.
23
                   At some point in time, did you
                                                            23
                                                                               MR. GAGE: Objection.
24
       discuss with Mr. Shaukat what role Ms. Rowe would
                                                            24
                                                                               I'm sorry, when -- when she went to
                                                                        A.
25
                                                            25
                                                                   OCTO?
       have going forward? And now I'm focusing on the
                                                Page 151
                                                                                                            Page 153
1
                       - STUART BRESLOW -
                                                             1
                                                                                   - STUART BRESLOW -
 2
       time after the conversation that you just
                                                                        0.
                                                                               Prior to that.
 3
       described as to with respect to how you learned
                                                                               When what --
 4
       you were going to have that role.
                                                                               During the period of time
 5
                   Yeah, I -- I talked about it. You
                                                             5
                                                                   between when you became the head of financial
 6
       know, basically, it was between him and Ulku as to
                                                                   services in late 2018/early 2019 and when she left
 7
       how they were going to go forward. I certainly,
                                                                   to go back to OCTO --
 8
       again as I indicated earlier, welcomed her into
                                                             8
                                                                        Α.
                                                                               Right.
9
       the group and would have wished to have been
                                                                               -- did you discuss with Mr. Shaukat
                                                             9
10
       there, but that was between -- the two of them
                                                            10
                                                                   how -- what her role and responsibilities would be
11
       discussed it. All I cared about was getting some
                                                            11
                                                                   as compared to what your role and responsibilities
12
       clarity so that the organization knew who was
                                                            12
                                                                   would be?
13
       doing what.
                                                            13
                                                                               MR. GAGE: Objection.
14
                   Tell me everything you said to Mr.
                                                            14
                                                                               I don't recall a specific
15
       Shaukat and everything he said to you with respect
                                                            15
                                                                   conversation about it, but I viewed her as my
16
       to what Ms. Rowe's role would be going forward.
                                                            16
                                                                   partner and wanted to -- you know, and as
17
                   MR. GAGE: Objection.
                                                            17
                                                                   welcome -- was open to having her work with me and
18
                   So I came to learn at some point
                                                            18
                                                                   to figure out some way to -- to do that together.
19
       that she didn't -- that she wanted -- that she
                                                            19
                                                                               What did you understand her role and
20
       didn't find working in the Cloud, in the financial
                                                            20
                                                                   responsibilities to be at that time?
21
       services vertical acceptable and that she was
                                                            21
                                                                               MR. GAGE: Objection.
22
                                                            22
                                                                               All -- all I knew about what Ulku was
       going to transition back to OCTO; and that
23
       the -- the conversation I had with Tariq about it
                                                            23
                                                                   doing was that she was doing a lot of client
       was he let me know that she was doing that and
24
                                                            24
                                                                   outreach and a lot of presentat -- you know,
25
       that in doing that she would not be dedicated to
                                                                   presentations at conferences which, you know,
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